

WILMERHALE

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May 28, 2014

VIA ECF

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York NY 10007-1312

Re: *Amplify Education, Inc. v. Greenwood Publishing, Inc. d/b/a Heinemann*
Civil Action No. 1:13-cv-02687 (S.D.N.Y.)

Dear Judge Swain:

I write on behalf of Defendant and Counterclaim Plaintiff Greenwood Publishing, Inc. d/b/a Heinemann and Plaintiff and Counterclaim Defendant Amplify Education, Inc. to jointly request a 7-day extension of the deadlines under Local Patent Rules 11 (Joint Claim Construction Chart) and 12 (Claim Construction Briefing).

The parties have exchanged proposed constructions and are negotiating ways in which to streamline the claim construction process by narrowing the number of terms and/or claims at issue. Therefore, the parties jointly request a 7-day extension to continue negotiations.

The new schedule would be as follows:

	Current Due Date	Proposed Due Date
Joint Disputed Claim Terms Chart	May 29, 2014	June 5, 2014
Opening Claim Construction Brief	June 12, 2014	June 19, 2014
Responsive Claim Construction Brief	July 14, 2014	July 21, 2014
Reply Claim Construction Brief	July 21, 2014	July 28, 2014

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If Your Honor finds the extension acceptable, the parties respectfully request that you so order this schedule and have it entered on the docket.

Sincerely,

/s/Robert J. Gunther

Robert J. Gunther, Jr.

cc: Counsel of Record

RJG:alc